

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: E. I. DU PONT DE  
NEMOURS AND COMPANY C-8  
PERSONAL INJURY LITIGATION**

**Case No. 2:13-md-2433**

**CHIEF JUDGE EDMUND A. SARGUS, JR.  
Magistrate Judge Elizabeth Preston Deavers**

**This document relates to:**

***Larry Ogle Moody v. E. I. du Pont de Nemours and Company,*  
Case No. 2:15-cv-803**

**PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE**

Pursuant to Federal Rule of Evidence 201, Plaintiff Larry Ogle Moody hereby requests that the Court take judicial notice of the following adjudicative facts which are not subject to reasonable dispute:

1. Plaintiff's Exhibit P1.2543 (EID951145-EID951147) was written by Roger J. Zipfel.
2. On October 4, 1991, Mr. Zipfel was a supervisor at DuPont's Washington Works facility who had supervisory responsibility for C-8 reduction and safety-related programs for DuPont.
3. Mr. Zipfel wrote Exhibit P1.2543 on October 4, 1991, after a meeting with Mr. Gerry Kennedy, who was then a scientist at DuPont's Haskell Laboratories, and with Dr. Bruce Karrh, who was then DuPont's Medical Director.
4. Mr. Zipfel was one of the DuPont employees who had decision-making authority at DuPont with respect to the safety of C-8.

In support hereof, Plaintiff refers this Court to the trial testimony of Roger J. Zipfel, taken in (David Freeman v. E.I. DuPont de Nemours and Company, Case No. 2:13-cv-1103), on June 22-23, 2016, at the following pages: 15-229:21 to 15-229:22; 15-231:24 to 15-236:23; 15-239:3 to 15-240:20, 15-242:24 to 15-243:6, 16-108:22 to 16-119:1 (Attachment "A").

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF on this 31<sup>st</sup> day of October, 2016 and was thus served electronically upon all counsel of record.

Michael A. London  
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